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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE UTSTARCOM, INC.
SECURITIES LITIGATION

) Master File No. C-04-4908-JW(PVT)

) **JOINT STIPULATION AND**
) **[PROPOSED] ORDER REGARDING**
) **REVISED BRIEFING SCHEDULE**
) **FOR DEFENDANTS' MOTIONS TO**
) **DISMISS THE THIRD AMENDED**
) **CONSOLIDATED COMPLAINT**

This Document Relates to:
ALL ACTIONS.

1 WHEREAS, on March 20, 2007, the Court entered an Order Granting Defendants'
2 Motions to Dismiss the Second Amended Consolidated Complaint with Leave to Amend
3 ("March 20 Order");

4 WHEREAS, the March 20 Order required plaintiffs to file and serve a Third Amended
5 Consolidated Complaint ("TAC") on or before April 30, 2007;

6 WHEREAS, in order to accommodate plaintiffs' counsel's schedule, the parties
7 stipulated to an amended briefing schedule that required plaintiffs to file and serve a TAC on or
8 before May 14, 2007, and the Court so ordered;

9 WHEREAS, in order to accommodate defendants' counsel's schedule and in the interest of
10 efficiency, the parties have conferred and agreed to a revised schedule for plaintiffs to file a TAC
11 and the parties to brief defendants' motions to dismiss the TAC;

12 NOW THEREFORE, pursuant to the parties' stipulation and subject to the Court's
13 approval:

14 (a) Plaintiffs' TAC shall be filed no later than May 25, 2007;

15 (b) Defendants' motions to dismiss the TAC shall be filed no later than July 13, 2007;

16 (c) Plaintiffs' briefs in opposition to defendants' motions to dismiss the TAC shall be
17 filed no later than August 21, 2007;

18 (d) Defendants' reply briefs in support of their motions to dismiss the TAC shall be
19 filed no later than September 18, 2007; and

20 (e) The hearing on defendants' motions to dismiss the TAC shall be set for October
21 ¹⁵ ~~8~~ 2007, at 9 a.m.

22 IT IS SO STIPULATED.
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1 Dated: May 10, 2007

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

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4 By: /s/ BAHRAM SEYEDIN-NOOR
BAHRAM SEYEDIN-NOOR

5 Attorneys for Defendants UTStarcom Inc.,
6 Hong Liang Lu, Michael J. Sophie, Howard
7 Kwock, Gerald S. Soloway, Shao-Ning J.
8 Chou, William H. Huang, Ying Wu, and
Thomas Toy

9 Dated: May 10, 2007

SULLIVAN & CROMWELL LLP

10
11 By: /s/ ROBERT A. SACKS
12 ROBERT A. SACKS

13 Attorneys for Defendants SOFTBANK
14 America, Inc., SOFTBANK Holdings, Inc. and
SOFTBANK Corporation

15
16 Dated: May 10, 2007

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP

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19 By: /s/ CHRISTOPHER P. SEEFER
20 CHRISTOPHER P. SEEFER


21 Lead Counsel for Plaintiffs
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ORDER

PURSUANT TO THIS STIPULATION, AND GOOD CAUSE APPEARING, IT IS SO ORDERED.

The Hearing on the Defendant's Motion to Dismiss the Third Amended Complaint shall be heard on October 15 2007 at 09:00 AM

Dated: May 10 2007


The Honorable James Ware
United States District Court Judge

1 I, Bahram Seyedin-Noor, am the ECF User whose identification and password are being
2 used to file the Joint Stipulation and [Proposed] Order Regarding Revised Briefing Schedule for
3 Defendants' Motions to Dismiss the Third Amended Consolidated Complaint. I hereby attest
4 that Robert A. Sacks and Christopher P. Seefer have concurred in this filing.

5
6 Dated: May 10, 2007

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

7
8 By: /s/ Bahram Seyedin-Noor
Bahram Seyedin-Noor

9
10 Attorneys for Defendants UTStarcom Inc., Hong
11 Liang Lu, Michael J. Sophie, Howard Kwock, Gerald
12 S. Soloway, Shao-Ning J. Chou, William H. Huang,
13 Ying Wu, and Thomas Toy
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